



STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
& ENVIRONMENTAL CONTROL
DIVISION OF AIR QUALITY
STATE STREET COMMONS
100 W. Water Street, Suite 6A
DOVER, DELAWARE 19904

Telephone: (302) 739 - 9402
Fax No.: (302) 739 - 3106

February 1, 2017

MANUFACTURED HOME RELOCATOIN AUTHORITY
110 N. MAIN ST. SUITE G
CAMDEN, DE 19934

Re: Relocating / Renovating / Demolishing / Dismantling of Mobile Homes

Dear Owner / Operator:

Delaware's Department of Natural Resources and Environment Control (DNREC) would like to remind you of the various asbestos regulations that apply if you plan to move, relocate, renovate, demolish, dismantle, or recycle any mobile home located at your facility.

DNREC incorporated the USEPA, 40 CFR Part 61, Subpart M (asbestos NESHAP) into Section 10 of 7 DE Admin Code 1121 (Emission Standards for Asbestos). DNREC also enforces 16 DE Admin Code 4103 (Asbestos Certification) on behalf of Delaware OMB / DFM, and through that Regulation, applicable sections of USDOL / OSHA 29 CFR, Part 1926.1101(Asbestos) and Part 1910.1001(Construction).

Accordingly, a plan to conduct any of the above-mentioned activities involving any mobile home starts with a presumption of asbestos-containing materials (ACM) in the structure, or obtaining an inspection with a report proving otherwise.

USEPA (40 CFR §61.145(a)) requires Owners / Operators to inspect for asbestos prior to the start of demolition or renovation at a facility. USDOL / OSHA (29 CFR 1926.1101 (k) (5) (ii) (A)) requires an asbestos inspection to be in accordance with AHERA (40 CFR Part 763, Subpart E). And OMB / DFM (16 DE Admin Code 4103.5.3.10) requires that Certified Professional Service Firms (inspectors) produce valid asbestos reports.

If the inspector reports that there is no asbestos in a mobile home, the Owner may hire any contractor to complete the project.

But, if the inspector reports the presence of asbestos-containing materials (ACM) in a mobile home, the Regulations require that the Owner hire a certified Asbestos Contractor to abate the asbestos, prior to completing the project.

Delaware's good nature depends on you!

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Finally, for your information, USEPA listed a number of building components that may contain asbestos.

Please note that the following list does not include every product / material that may contain asbestos.

Sample List of Suspect Asbestos-Containing Materials

Cement Pipes	Elevator Brake Shoes
Cement Wallboard	HVAC Duct Insulation
Cement Siding	Boiler Insulation
Asphalt Floor Tile	Breaching Insulation
Vinyl Floor Tile	Ductwork Flexible Fabric Connections
Vinyl Sheet Flooring	Cooling Towers
Flooring Backing	Pipe Insulation (corrugated air-cell, block, etc.)
Construction Mastics (floor tile, carpet, ceiling tile)	Heating and Electrical Ducts
Acoustical Plaster	Electrical Panel Partitions
Decorative Plaster	Electrical Cloth
Textured Paints/Coatings	Electric Wiring Insulation
Ceiling Tiles and Lay-in Panels	Chalkboards
Spray-Applied Insulation	Roofing Shingles
Blown-in Insulation	Roofing Felt
Fireproofing Materials	Base Flashing
Taping Compounds (thermal)	Thermal Paper Products
Packing Materials (for wall/floor penetrations)	Fire Doors
High Temperature Gaskets	Caulking/Putties
Laboratory Hoods/Table Tops	Adhesives
Laboratory Gloves	Wallboard
Fire Blankets	Joint Compounds
Fire Curtains	Vinyl Wall Coverings
Elevator Equipment Panels	Spackling Compounds

Hope this helps, and if you have any questions, please feel free to contact me.

Sincerely,

Tom Postell

Environmental Program Manager
DNREC / DAQ / Area Source Compliance
Phone: 302 739-9402
Email: tom.postell@state.de.us